



COASTAL ENVIRONMENTAL ANALYSTS

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BY EMAIL

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**RE: Calculation Error in Permits for Bioassay Testing for the Joint Cannery Outfall
StarKist Samoa: NPDES Permit AS0000019
COS Samoa Packing; NPDES Permit AS0000027**

We recently noted a minor error in the above referenced permits that pertains to the trigger point specified for the first three years of chronic bioassay testing. The error is under Part V.D.5.a. on pages 15 and 16 of the permits. The permits state:

"If during range finding testing in years one through three, one test result is found to be greater than 256 TU_c (during the semi-annual reporting period) or an NOEC of 0.390 percent effluent (which is based on a maximum allowable dilution of 313:1 estimated at the ZID), the permittee is required to perform accelerated toxicity testing."

Based on the requirement for a $TU_c = (100/NOEC) \leq 1$ at the edge of the ZID, the NOEC required, with an initial dilution of 313:1, is 100%/313 or 0.319 percent effluent (not 0.390 as stated in the permit). This translates into an effluent TU_c of $100/0.319 = 313$ (not 256 as stated in the permit), as it should for internal calculation consistency. Therefore we believe the permit should be corrected to read:

If during range finding testing in years one through three, one test result is found to be greater than **313 TU_c (during the semi-annual reporting period) or an NOEC of **0.319** percent effluent (which is based on a maximum allowable dilution of 313:1 estimated at the ZID), the permittee is required to perform accelerated toxicity testing.**

Please consider the above request, contact me with questions or concerns, and let me know of your determination.

Sincerely,

Karen A. Glatzel

Copy to: COS Samoa Packing: Jim Cox; Samual Augspurger
StarKist Samoa: Joe Carney; Tim Ruby

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